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Jonah H. Goldstein
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July 3, 2012

VIA E-MAIL AND U.S. MAIL

James D. Wareham
DLA Piper US LLP
500 Eighth Street, NW
Washington, DC 20004

Re: *City of Pontiac Gen. Employees' Ret. Sys. v. Lockheed Martin, et al.*
S.D.N.Y. Case No. 1:11-cv-05026-JSR

Dear Jamie:

Please find attached a notice and subpoena for the deposition of Ken Keatly, the investigator from L.R. Hodges and Associates, Ltd., who spoke to confidential witnesses 1-6 that are referenced in the Amended Complaint. The deposition will take place in our San Diego office on July 16, 2012, beginning at 9:30 a.m.

We will produce Mr. Keatly's investigative memoranda and contemporaneous notes for confidential witnesses 1-6, as well as other documents written by him that we intend to use at the deposition under a limited waiver of work product. All other documents generated by Mr. Keatly in connection with the investigation of this case remain our protected work product.

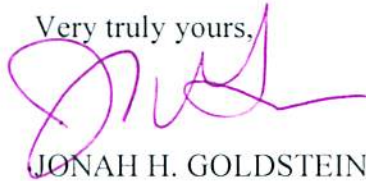
We requested that prior to the deposition of Stephen Lubniewski on July 10, 2012, you produce all documents concerning Mr. Lubniewski that have not been previously produced, including, without limitation, his personnel records, separation agreement(s), documents generated by him in the course of his employment, and documents you intend to use at his deposition. You agreed to produce those documents to us by Friday, July 6, 2012. Thus, we will produce the documents relating to Mr. Keatly referenced in the paragraph above on July 11th.

**Robbins Geller
Rudman & Dowd LLP**

James Warham
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Finally, we intend to rely solely on confidential witness 2 as the source for the information in the second sentence of paragraph 36 of the amended complaint. We will provide the Court notice of our intent in our forthcoming July 19, 2012 opposition to summary judgment.

Very truly yours,



JONAH H. GOLDSTEIN

JHG:tlc

cc: Sam Rudman
Patrick Coughlin
Evan Kaufman
John Hillbrecht